

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

POLICE AND FIRE RETIREMENT
SYSTEM OF THE CITY OF DETROIT,
PLYMOUTH COUNTY RETIREMENT
SYSTEM, STATE-BOSTON
RETIREMENT SYSTEM, and
MICHAEL GOLDE, On Behalf of
Themselves and All Others Similarly
Situated,

Plaintiffs,

v.

SAFENET, INC., ANTHONY A.
CAPUTO, KENNETH A. MUELLER,
CAROLE D. ARGO, THOMAS A.
BROOKS, IRA A. HUNT, Jr., BRUCE R.
THAW, ARTHUR L. MONEY,
SHELLEY A. HARRISON, and
ANDREW E. CLARK

Defendants.

Lead Case No.: 06 Civ. 5797 (PAC)

**NOTICE OF FILING OF
STIPULATION AND AGREEMENT OF
SETTLEMENT**

TO: All counsel of record

PLEASE TAKE NOTICE that Lead Plaintiffs the Police and Fire Retirement System of the City of Detroit, the Plymouth County Retirement System and the State-Boston Retirement System, on behalf of themselves and the proposed Settlement Class, are hereby filing as Exhibit 1 hereto the Stipulation and Agreement of Settlement, dated September 13, 2010, (and annexed exhibits) with defendants SafeNet, Inc., Anthony A. Caputo, Carole D. Argo, and Kenneth A. Mueller.

DATED: New York, New York
September 14, 2010

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